UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHWEST ADMINISTRATORS, INC.,

Plaintiff,

٧.

ST. JAMES HEALTHCARE, a Montana corporation, d/b/a SCL Health,

Defendant.

NO. C19-629-MJP

STIPULATED MOTION AND ORDER TO CONTINUE COURT DATES

NOTE ON MOTION CALENDAR: July 1, 2019

THE PARTIES above named, through their attorneys Russell J. Reid of Reid, McCarthy, Ballew & Leahy, L.L.P., attorneys for Plaintiff, and William Jie Woo Kim of Littler Mendelson, P.C., attorneys for Defendant, St. James Healthcare, hereby stipulate that pursuant to the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement dated May 24, 2019 scheduling deadlines for the FRCP Conference for June 21, 2019, Initial Disclosures for June 28, 2019, and Joint Status Report for July 5, 2019, pray the Court for a 30-day continuance of each of said dates.

This is the parties' first request for a continuance. The Court may extend the case schedule where good cause exists. Fed. R. Civ. P. 16(b)(4); LCR 16(b)(5); Johnson v. Mammoth Recreations, Inc., 975 F.2d 604 (9th Cir. 1992). The parties have stipulated that good cause exists. Since this case was filed, Defendant has indicated that it is in the process of accumulating the data requested in the Complaint. With Court deadlines regarding Initial Disclosures, Joint Status Report, and Early Settlement approaching, the parties desire to avoid the expense of ligation as well as allow more time for Defendant to gather and provide the data for Plaintiff. This may negate the need for ongoing litigation, a pretrial conference, and trial, saving the parties costs, because having to litigate the actual case will be expensive. A continuance would allow the parties more time to further explore resolution.

Based on the above, an extension of 30 days for each of the scheduled dates referenced above should be granted.

DATED this 28th day of June, 2019.

REID, McCARTHY, BALLEW & LEAHY, LITTLER, MENDELSON, P.C. L.L.P.

s/Russell J. Reid Russell J. Reid, WSBA #2560

Attorney for Plaintiff

s/William Jie Woo Kim authorized to sign via email of 6/28/19 William Jie Woo Kim, WSBA #46792 Attorney for Defendant

ORDER GRANTING MOTION FOR CONTINUANCE OF COURT DATES. Based on the foregoing Stipulation of Plaintiff and Defendant,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the parties' Stipulated Motion to Continue Court Dates has been granted as follows:

Deadline for FRCP 26(f) conference......July 22, 2019

Initial Disclosures Pursuant to FRCP 26(a)..... July 29, 2019

Combined Joint Status Report and Discovery
Plan as Required by FRCP 26(f), and Local
Rule CR 16......August 5, 2019

DONE IN OPEN COURT this 1st day of July, 2019.

Marsha J. Pechman United States District Judge

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Presented for Entry by:

<u>s/Russell J. Reid</u> Russell J. Reid, WSBA #2560 of Reid, McCarthy, Ballew & Leahy, L.L.P. Attorney for Plaintiff